

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
MEDTECH PRODUCTS INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
RANIR, LLC and)	
CVS PHARMACY, INC.)	
)	
Defendant.)	
_____)	
MEDTECH PRODUCTS INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 07 CV 3302 (KMK) (LMS)
v.)	
)	
DENTEK ORAL CARE, INC.,)	PLAINTIFF'S MOTION TO FILE
)	EXHIBITS UNDER SEAL
)	
Defendant.)	
_____)	
MEDTECH PRODUCTS INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
POWER PRODUCTS, INC.)	
d/b/a SPLINTEK,)	
)	
Defendant.)	
_____)	

Plaintiff Medtech Products Inc. hereby moves this Court pursuant to Fed. R. Civ. P. 26(c) for an order to file under seal Exhibits 1-A, 1-B, 1-C, 1-D, 1-F, 1-G, 1-H, 1-M, 1-N, 1-O, 1-P,

and 1-Q to its Motion to Amend the Scheduling Order and Motion for Leave to File Its Second Amended Complaint and Memorandum of Law in Support Thereof (“Motion to Amend”), which was filed in the captioned case on August 24, 2007 (copies of these exhibits are attached only to the courtesy copy of this motion).

Exhibit 1-A is a consulting agreement and pursuant to the terms of the consulting agreement itself, disclosure of the contents of the consulting agreement may violate the terms of that agreement. Exhibits 1-B, 1-C, 1-D, 1-F, 1-G, 1-H, 1-P, and 1-Q contain confidential and/or proprietary information. Exhibits 1-M, 1-N, and 1-O are documents that were produced in response to Medtech’s Subpoena Duces Tecum to Mr. Raymond Duane and were produced on an “Attorneys’ Eyes’ Only” basis of confidentiality. As such, Plaintiff respectfully requests that the Court file Exhibits 1-A, 1-B, 1-C, 1-D, 1-F, 1-G, 1-H, 1-M, 1-N, 1-O, 1-P, and 1-Q of its Motion to Amend under seal.

Dated: August 24, 2007

Respectfully submitted,

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